switches serving the areas must be from the same manufacturer. In addition, the switches must be interconnected with dedicated voice and data circuits.

The most common method of handling roamer traffic today is to allow the first call and then the switch requests a verification of the roamer's status from its home carrier. This involves the use of an external database service known as Positive Roamer Validation ("PRV"). The carrier's switch has a data circuit (anything from dial-up to dedicated) to the PRV service and after the first call is placed, it sends the roamer's identification to the service for validation. This process can take up to an hour or longer to complete, during which the radio-based carrier will usually deny any further service. Moreover, the radio-based carriers normally only provide this service to roamers of like carriers, that is, A block to A block, and B block to B block.

CSI subscribers are hampered by the fact that the only roaming agreements are between radio-based carriers. In addition, several different methods are used to validate and carry subscriber calls. Occasionally CSI subscribers are refused roaming because of problems from one radio-based carrier with another.

8Q. How will the CSI switch affect the current roaming process?

A. CSI will directly connect to switches where it is economically feasible and where its customers have the greatest

amount of roaming needs. By direct connection to radio-based cellular carriers in other cities, where CSI is also a reseller, each of CSI's NPA-NXX codes will be programmed into the radio-based cellular carrier's switch and forwarded to CSI for processing. CSI expects that it would provide greater efficiencies and be charged the same airtime rate for every minute used by each of its customers, based locally or not, thereby eliminating current onerous roaming charges.

9Q. Are there other services that a switch-based cellular reseller can offer in addition to those already mentioned?

A. Most of the services outlined in this testimony are related to features and functions that occur prior to or during call processing. By operating its own switch, CSI could also enable the subscriber to design its own billing format, using a variety of custom billing options. These would include:

Client-Code Billing. A user could enter a two- or three-digit code with each telephone number that is dialed from the cellular telephone, and charges for that call would accrue to the "account" of the client to be billed.

Immediate Billing. This refers to the capability of the CSI switch to output call detail records in real time. This would include both financial verification of calls in addition to unit verification. These records could be made available to customer service representatives, so that a customer who experiences a poor quality call can receive immediate credit. This would also allow customers the ability to establish call limits that would

disallow any further calls above that limit, except for certain telephone numbers and emergency services.

From the switch-based carrier's perspective, pre-set credit limits could be established on a per-customer basis. Customers who present credit risks could be required to pre-pay for service, or could be billed on a more frequent basis.

Billing Computer Link. On a time interval specified by the subscriber, call records could be output from the CSI switch directly to the subscriber's computer system. Large accounts could use this feature to monitor the calls of employees, and non-switch-based cellular resellers would have immediate access to the call detail records of their subscribers.

10Q. Does this conclude your testimony?

A. Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of May, 1994, I caused a true copy of the Petition for Reconsideration of Cellular Service, Inc. and ComTech, Inc. to be served by first-class mail, postage prepaid, upon the following parties:

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